

REPORTING/MONITORING EXHIBITS

R/M-1	Monitoring checklist for economic development revolving loan grants	
R/M-2	CDBG monitoring checklist applicable to most projects including the internal control questionnaire	pg. 6
R/M-3	“Project Specific” Monitoring checklists for other types of contracts including:	
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EXHIBIT R/M-1
UTAH

CDBG ECONOMIC DEVELOPMENT REVOLVING LOAN
MONITORING GUIDELINES

NOTE TO REVIEWER: On a separate page please provide a narrative showing how the project met any or all of the items listed in the checklist.

CDBG Grant Number: _____

Date of Review: _____

Reviewer: _____

Project Description: _____

Location of Project: _____

Place: _____

County: _____

1. NATIONAL OBJECTIVE COMPLIANCE

a. How did the grantee decide to make jobs available to LMI persons?

b. How many jobs did the recipient commit to?

c. How many jobs did the recipient make available to date?

d. Indicate how the jobs were verified:

Pre-hire family income: _____

Certifications filed? ☐ YES ☐ NO

No.# _____

Were the certifications acceptable? _____

☐ YES

☐ NO

☐ Training

☐ OFFICE OF WFS

☐ Other

Location: _____

ADVERTISING AND RECRUITMENT

e. Agreement or contract contained job creation and goal? _____

☐ YES

☐ NO

Were the conditions Acceptable to ensure job creation? _____

☐ YES

☐ NO

f. Was the project to retain jobs, if so what documentation was provided to show that the business would have closed or relocated without the use of CDBG funds?

☐ YES

☐ NO

-
- g. Was the "first consideration" used for turnover jobs in employing L.I.? ☐ YES ☐ NO
- h. Were the retained jobs "taken by" new LMI employees? ☐ YES ☐ NO
- Verification used?
-

2. NECESSARY OR APPROPRIATE TEST

• NECESSARY

- a. What was the project type? ☐ Real Estate ☐ User project ☐ Hybrid
- b. Describe the public benefit which will be derived from the project?
-

- c. Were the public funds used to accomplish the tasks in the agreement? ☐ YES ☐ NO
- d. Were the private funds used in accordance with the agreement? ☐ YES ☐ NO
- e. Has the grantee reviewed the project on-site and documented the expenditure of the funds in accordance with the agreement? ☐ YES ☐ NO
- ☐ Serial Numbers Checked ☐ Payrolls Checked ☐ Invoices & Canceled Checks reviewed
- f. Is the project proceeding according to the time frame in the agreement? ☐ YES ☐ NO
- g. What was the public to private dollar ratio?
- h. Are the repayments being received according to the agreement? ☐ YES ☐ NO

• FINANCIAL ANALYSIS

- a. Were project costs verified? ☐ YES ☐ NO
- b. Are costs reasonable as compared to industry standards? ☐ YES ☐ NO
- c. Is there documentation to show that the project would not have created a new business or expanded an existing business without the public assistance? ☐ YES ☐ NO
- Indicate what type of documentation was provide?
-

- d. What type of documentation was obtained to show that adequate private financing was not available to fund the entire project?
-

- e. Has the rate of return been evaluated? ☐ YES ☐ NO

Documentation used?

- f. Was the cost of the loan evaluated? ☐ YES ☐ NO

What was the interest rate and how was it calculated?

- g. Rationale for assistance.

Type of Gap identified

Documentation of gap

• APPROPRIATE

- a. Was a statement prepared to show that the project was of particular value and importance to the community it benefited? ☐ YES ☐ NO
- b. Was the statement adequate? ☐ YES ☐ NO
- c. Describe the justification used?
-

3. ELIGIBILITY

- a. Was a determination of eligibility made? ☐ YES ☐ NO
- b. Identify the type of assistance provided?
- ☐ Off-site infrastructure ☐ On-site infrastructure
- ☐ Blending ☐ Interest buy down
- ☐ Guarantees ☐ Grants
- c. Identify the type of loan.
- ☐ Acquisition ☐ Construction ☐ Equipment
- ☐ Inventory ☐ Salaries ☐ Other working capital (define)
-

4. EQUITY/SECURITY

- a. Identify the type of security or equity provided.
-

5. DEFAULT

- a. If the targeted jobs were not created when will they be?
- b. Has the company met its full job creation potential? ☐ YES ☐ NO
- c. Was a good faith effort made to create adequate LMI jobs? ☐ YES ☐ NO

What documentation is provided?

d. Was there any suspected fraud in the use of the federal funds?

☐ YES

☐ NO

RLF ENVIRONMENTAL REVIEW
(Revised 2/02)

Date of Review: _____

LENDING ENTITY: _____

Loan # _____ Loan Amount: Total \$ _____ CDBG \$ _____

Loan Recipient _____

Activity and Location: _____

ECO _____

DPA Determination _____

Date of Loan Closing _____

Date of ERR Release _____

Checklist (If appropriate) _____

Publication (If appropriate) _____

Certification _____

Date of Review: _____

LENDING ENTITY: _____

Loan # _____ Loan Amount: Total \$ _____ CDBG \$ _____

Loan Recipient _____

Activity and Location: _____

ECO _____

DPA Determination _____

Date of Loan Closing _____

Date of ERR Release _____

Checklist (If appropriate) _____

Publication (If appropriate) _____

Certification _____

R/M Exhibit 2

CDBG MONITORING CHECK LIST

This checklist is provided as a courtesy to help you prepare for the CDBG monitoring visit. This visit is not an audit; it is performed to assist you in making sure that your jurisdiction is maintaining all the required state and federal documentation, and that your completed project has met the National requirements for this federal grant. Also remember that a CDBG grant is a public record. The General Public may request to be allowed to review certain portions, those not protected by any privacy acts. Incomplete files or files which cannot support activity undertaken could result in legal action or possible forfeiture of funds.

The majority of items listed below apply to all types of grants; however some criteria are “project specific” and may not apply to your grant. These types of criteria should be apparent and individual “project specific”. checklists follow these pages in the Exhibit Section. As soon as the date for a monitoring visit has been set, you should review your files to ensure that all necessary documents are included.

PROGRAMMATIC DOCUMENTS

- ☐ Pre- and final application.
- ☐ Two notices of public hearings to document grant application and award, and minutes from those public hearings
- ☐ CDBG Contract between state and your jurisdiction.
- ☐ Cooperative agreement with a sub-grantee and proof of non-profit status.
- ☐ Income survey sheets, tabulations, and survey instrument.
- ☐ Slum/Blight Resolution.
- ☐ Copy of regional consolidated plan or the portion that applies to your jurisdiction and project.
- ☐ Commitment letters from non CDBG funding sources or other funding verification.
- ☐ Anti-dislocation plan.
- ☐ 504 inventory assessment i.e. checklist of ADA compatibility of jurisdictions facilities.

ENGINEER/ARCHITECT

- ☐ Request for Proposal (REQUEST FOR PROPOSAL (RFP) for engineer/architect, prepared within last 5 years.
- ☐ Contract between engineer/architect and jurisdiction.

ADMINISTRATION/FINANCIAL

- ☐ Verification of administration costs: i.e. time sheets, invoices, etc. How are wages determined?
- ☐ Request For Funds (RFF) forms with evidence of receipt and deposit of State funds, invoices and canceled checks to contractors

ENVIRONMENT

- ___ ECO Resolution
- ___ Description of Proposed Action signed by ECO
- ___ Completed checklist
- ___ Public notices and Request for Release of Funds and Certification , if required,
- ___ Environmental release letter signed by State CDBG ECO.

LABOR

- ___ Davis Bacon wage rate decision, contractor and sub-contractor eligibility from state labor specialist.
- ___ Proof of contract bid advertising, bid opening date, contractor tabulation and notice of contractor award.
- ___ Pre-construction conference minutes.
- ___ Contract between jurisdiction and contractor including form 4010, EEO statement and the Davis Bacon wage rate decision. Any change orders including amounts.
- ___ Evidence of attempts to use minority contractors and workers if contract over \$100,000.
- ___ Weekly payroll forms numbered sequentially, signed, and **checked for accuracy by grantee.**
- ___ Payroll interviews, completed monthly, including all laborers and at least 10% of the workforce.

CIVIL RIGHTS

- ___ A published or posted copy of a recent job procurement notice
- ___ Copy of any written Personnel Policies
- ___ Copy of the Grantee's EEO Resolution
- ___ Names of other programs operated by the grantee for public benefit
- ___ Percentage of minorities in recipient population.
- ___ "Project Specific" questions will be asked as required. Review the Monitoring pages in the Exhibit Section that follows that relate to your activity.

INTERNAL CONTROL QUESTIONNAIRE

(REVISED 2/02)

PART I - PROJECT OCCUPANCY LIST

SINGLE AUDIT REQUIRED: _____ RECEIVED: _____

Single audits must be sent to the attention of David Fleisher, Accountant, at the State CDBG Office within 30 days of completion. REMINDER: _____

PART II - GENERAL INFORMATION

1. What is the make-up of the governing body or council of the jurisdiction? _____

2. How often does the Council meet? Who keeps the minutes of the meetings? _____

3. Does the Council operate as a council or does each member have specific line item responsibility? _____

4. ☐ YES ☐ NO Does the organization have fidelity bond coverage for the responsible officials, as required by law? _____

PART III - ACCOUNTING SYSTEM

☐ YES ☐ NO 1. Is there a chart of accounts?

☐ YES ☐ NO 2. Is a double-entry accounting system used?

☐ YES ☐ NO 3. Does the institution maintain the basic books of accounts?

☐ YES ☐ NO ☐ Cost Journal

☐ YES ☐ NO ☐ General Ledger

☐ YES ☐ NO ☐ Project Ledger

If not, briefly describe the books of accounting maintained. _____

☐ YES ☐ NO 4. Does the accounting system adequately identify receipts and expenditures for each grant or contract? _____

☐ YES ☐ NO 5. Does the institution prepare financial statements at least annually? _____

☐ YES ☐ NO 6. Have the financial statements been audited within the last two years by an independent account? _____

Who are the auditors: _____

☐ YES ☐ NO 7. Does the entity use the State Accounting Manual? _____

PART IV - BUDGETARY CONTROLS

☐ YES ☐ NO 1. Does the organization set-up budgets to control the project funds?

2. Who is responsible to monitor the budget compared to actual? _____

☐ YES ☐ NO 3. Do cash requests follow the immediate cash needs?

PART V - PROPERTY MANAGEMENT

☐ YES ☐ NO 1. Is a fixed asset ledger maintained by the jurisdiction?

2. How often is a physical inventory taken?

☐ YES ☐ NO 3. Are written policies in place to govern the acquisition and disposition of property and equipment?

PART VI - PURCHASES

☐ YES ☐ NO 1. Does the jurisdiction have written purchasing procedures?

2. Who has responsibility over purchasing?

3. Are purchase orders used for all or part of the jurisdictions purchasing?

☐ YES ☐ NO 4. Are large items to be purchased put out to competitive bid?

PART VII - INTERNAL CONTROLS

☐ YES ☐ NO 1. Is there separation of responsibility in the receipt, payment and recording of cash?

2. Who receives checks when they come in the mail?

3. Who makes the deposits of the funds received and how often are they deposited?

4. Who enters all the financial information into the book of entry?

5. Who prepares the check to be paid for invoices and bills received?

☐ YES ☐ NO 6. Are all checks approved before they are signed?
Who approves them?

7. How many signatures are required on a check?
Who can sign them?

☐ YES ☐ NO 8. Is a petty cash fund maintained?
Who controls it?
How much is kept in it?

☐ YES ☐ NO 9. Are all checks pre-numbered and accounted for when the bank account is reconciled?

10. Who prepares the bank reconciliation?

R/M Exhibit 3
PROJECT SPECIFIC CHECKLISTS

ACQUISITION
(revised 2/02)

CDBG Grantee: _____
Date of Review: _____

Contract # _____
Reviewer: _____

PART I - GENERAL INFORMATION

Project Description: _____
NO

YES or

- a. Is the acquisition exempt per 24 CFR 42.101(a)(1)?
- b. Is a copy of the "Notice of Exemption" in the file?
- c. If the property was donated, is there evidence the owner has informed of his rights?

PART II - PRELIMINARY ACQUISITION NOTICE

- a. Is a copy of the notice in the file?
- b. Is there evidence of receipt?

PART III – APPRAISAL

- a. Is a copy of the appraisal in the file?
- b. Was a qualified independent appraiser utilized?
- c. Is there evidence the owner was invited to accompany the appraiser and evidence of receipt?
- d. Was review appraisal performed?

PART IV - WRITTEN PURCHASE OFFER

- a. Is a copy of the written purchase offer in the file?
- b. Was the offer issued promptly after the appraisal?
- c. Is a statement of the basis for determining the offer for the property included in the offer?
- d. Are copies of any counter-offers from the property included in the file?
- e. If the grantee determined not to purchase, is there a notice and evidence of receipt?

PART V - PURCHASE AND PAYMENT

- a. Is a copy of all required purchase documentation in the file (deed, title evidence, etc.)?
- b. Is a statement of closing costs in the file?
- c. Is proof of receipt of payment in the file?
- d. Was payment timely?
- e. Is there proof of recording of the deed in the file?

PART VI - RENTAL AGREEMENTS

- a. If a tenant occupies the property acquired by this project, is the rental is a fair market value?

PART VII – APPEALS

- a. Is a copy of any payment for incidental expenses or certain litigation expenses in the file?
- b. Is there a record describing the determination and disposition of any appeal in the file?

PART VIII - COMMENTS

RELOCATION
(revised 2/02)

CDBG Grantee: _____
Date of Review: _____

Contract # _____
Reviewer: _____

YES or NO

PART I - PROJECT OCCUPANCY LIST

- a. Is there a comprehensive project list identifying the name and address of all persons occupying the property in compliance with HUD Notice CPD 89-42?

PART II - PERSONS NOT DISPLACED

- a. Is there evidence that timely written notice was received that resident would not be displaced?
b. Is there evidence that tenants received a timely offer of (a) a reasonable opportunity to lease and occupy a suitable, affordable, decent, safe and sanitary dwelling on the real property and reimbursement of any out-of-pocket expenses incurred in connection with any temporary relocation or a move to another unit on the real property?
c. Has each occupant this is not displaced but elects to move permanently from the real property indicated the reason for the move, and has the agency explained that the person will not qualify for relocation payments as a "displaced person"?

PART III - DISPLACED PERSONS

- a. Are there separate files for each person showing the information per HUD Notice CPD 89-42?
b. Is there evidence that the displaced person received timely written notice of possible displacement and a general description of relocation payments, advisory services, basic eligibility conditions and payment procedures?
c. Is there evidence that the displaced person received timely written notice of eligibility of relocation assistance and, for those displaced from a dwelling, the specific comparable replacement dwelling and the related cost to be used to establish the upper limit of the replacement housing payment?
d. Is there identification of relocation needs, dates of personal contacts and services provided in each case file?
e. Is there identification of referrals to replacement properties, date of referral, rent/utility costs or sale price, date of availability, and if applicable, the reason the person declined referral?
f. Is there a copy of the 90-day notice and the notice to vacate in the file?
g. Is the replacement property, rent/utility costs or sale price and date of relocation identified?
h. Is a copy of the replacement dwelling inspection report showing condition of unit and date of inspection in the file?
i. Is a copy of each approved claim form and related documentation: evidence that person received payment and, if applicable, Section 8 Certificate or Housing Voucher in the file?

PART IV – APPEALS

- a. Are any appeals contained in any of the individual case files?
b. Is there a copy of the appeal verdict included in the file?

PART V - COMMENTS

HOUSING REHABILITATION
(revised 2/02)

CDBG Grantee: _____
Date of Review: _____

Contract # _____
Reviewer: _____

PART I. APPLICANT INFORMATION

YES or NO

- a. Did each sub-recipient complete an application?
- b. Does the application form identify:
 - 1. Location of project
 - 2. A description of the work to be performed
 - 3. An estimate of the cost
 - 4. Income verification

PART II. INCOME VERIFICATION

- a. What methods are used to certify income?
- b. Have the appropriate Section 8 income guidelines been used?
- c. Is there evidence that income eligibility has been reviewed for every application that is approved?
- d. Is supporting documentation available for each application?

PART. III. ENVIRONMENTAL DOCUMENTATION

- a. Has every sub-recipient contract received an environmental release prior to the award of a contract?
- b. Does grantee keep each ERR file with the application?

PART IV. CONTRACTOR INFORMATION

- a. Is there documentation to show that all proper bidding procedures were followed in the award of a contract?
- b. Has the eligibility of contractors been documented?
- c. Describe how is this done?
- d. Are contracts with contractor's and descriptions of work compared before the contract is awarded?
- e. Does grantee maintain information for each sub-recipient contract for the contract award date and Start/Completion of construction?
- f. Have Davis-Bacon wages been paid if appropriate?
- g. Did the completed work receive a local inspection?
- h. Was the work performed in accordance with all local codes?

PART V. CONSTRUCTION CONTRACT MANAGEMENT

- a. Is a process in place that requires the sign-off of the sub-recipient on all checks to the contractor?
- b. Does each file contain copies of all vouchers and checks?

PART VI. VERIFICATION OF WORK PERFORMED

- a. Is a final inspection made by the grantee following the completion of each sub-recipient contract?
- b. Is the final inspection made with the sub-recipient or a designated representative?
- c. Is the sub-recipient made aware of the procedures available if the work done is not satisfactory?
- e. Does each file contain a certification of acceptable work performance signed by the sub-recipient?

PART VII. TRACKING OF RECIPIENTS

- a. If appropriate, does grantee have a process in place to track the following:
 - Occupant(s) of a rehabilitated rental unit for 5 years?
 - Proof of home-ownership of owner-occupant rehabilitated units for 5 years?
 - A rental prioritization list?
 - Documentation describing how grantee determines fair market rent?
 - Copies of deed restrictions, if owner occupied?

VII. COMMENTS

**FURTHERING FAIR HOUSING
(REVISED 2/02)**

1. Has grantee performed an Analysis of Impediments to determine whether housing discrimination could occur?

☐ YES

☐ NO

a. What impediments to fair housing were identified?

2. Has an action plan been prepared?

☐ YES

☐ NO

a. ☐ Short Term

☐ Long Term

b. Does it include financial elements, assurance of continuation when grantee officials change?

☐ YES

☐ NO

c. What does the plan present?

3. Does the Grantee have a Fair Housing Resolution in place?

☐ YES

☐ NO

4. What other activities is the grantee participating in to ensure fair housing?

NOTE DEFICIENCIES AND CORRECTIVE ACTIONS:

HOUSING REPLACEMENT/CONVERSION
(REVISED 2/02)

1. Is LMI Housing demolition part of the contract? ☐ YES ☐ NO
Number of units demolished?
2. Is the conversion of residential housing part of the contract? ☐ YES ☐ NO
Number of units to be converted to a non LMI residential use?
What is the proposed use?
3. How was the determination made that the unit(s) to be demolished/changed use meet the LMI criteria?
☐ Unit(s) (including utilities) does not exceed the Fair Market Rent (FMR).
☐ Cost of unit doesn't exceed 30% of family earning 65% or more of mediate income.
☐ Prior to the CDBG activity was the dwelling unit either "occupied" or
☐ "Vacant Occupiable" (unit is considered "occupied" if it was any time during the previous 12 months to the date of the contract with the property owner for CDBG assistance)
4. If only some or a portion of the units meet the LMI criteria, identify which they are:
5. Does the number of units to be replaced equal the number to be demolished? ☐ YES ☐ NO
6. Are the replacement units located within the grantee's jurisdiction, and to the extent feasible, located within the same neighborhood? ☐ YES ☐ NO
7. Are the replacement units comparable (or will they be) in terms of total number of bedrooms
a. those units demolished or converted? ☐ YES ☐ NO
OR
b. If the replacement units are smaller than those converted or demolished, did the grantee, before committing funds, provide information to the citizens and to HUD demonstrating the proposed replacement is consistent with the housing needs of lower-income households in the jurisdiction? ☐ YES ☐ NO
8. Were the replacement units made available for occupancy (or will they be) one year before date submission of the required form? ☐ YES ☐ NO
9. Are the replacement units in standard condition? ☐ YES ☐ NO
10. Before obligating any CDBG funds did the grantee make public and submit to HUD the following:
☐ Description of proposed Activity.
☐ Number of housing units (by size-bedrooms) to be demolished or converted.
☐ Provide a map showing demolition/conversion and replacement units
☐ Schedule of start and completion of demolition/conversion
☐ Schedule for providing replacement
☐ Source of funding for replacement
☐ Basis for concluding replacement units will remain L/M for 120 years from that of occupancy.
11. How was the information made public?
12. Was there an exception to the one-for-one replacement? ☐ YES ☐ NO
13. Did the grantee make this information public and allow 30 days for respondents to provide additional information to HUD on this matter before taking action? ☐ YES ☐ NO

COMMENTS:

PLANNING ACTIVITIES
(REVISED 2/02)

1. Is there a consultant agreement? ☐ YES ☐ NO

Name of Consultant?

2. What is the type of plan that was to be prepared?

☐ **SLUM/BLIGHT ELIMINATION**

What criteria of S/B were identified in the application?

Has each of these conditions been addressed in the plan? ☐ YES ☐ NO

☐ **WATER/SEWER/STORM DRAIN**

☐ **ECONOMIC DEVELOPMENT (MAXIMUM TIME ALLOWED - 2 YEARS)**

What was the year of commencement of the plan?

Has the grantee applied for second year of planning assistance? ☐ YES ☐ NO

Has the plan been completed? ☐ YES ☐ NO

When is the ED Plan to be put into effect?

How is grantee documenting evidence of National Objective compliance?

☐ **CONSOLIDATED PLAN**

☐ **INDIVIDUAL COMMUNITY PHYSICAL DEVELOPMENT**

Community Assisted: _____ Plan prepared: _____ Meets
N.O.:

Community Assisted: _____ Plan prepared: _____ Meets N.O.:

Community Assisted: _____ Plan prepared: _____ Meets N.O.:

Community Assisted: _____ Plan prepared: _____ Meets N.O.:

(Use other side if necessary)

☐ **OTHER: Identify:**

3. Does the plan satisfy the contract scope? ☐ YES ☐ NO

4. Has the plan been completed? ☐ YES ☐ NO
If not, when is completion expected?

5. Has the plan been accepted by the grantee? ☐ YES ☐ NO
If not, when is acceptance expected?

6. Was a time frame of plan preparation by element submitted at the onset on the consultant contract? ☐ YES ☐ NO

COMMENTS:

EQUIPMENT ACQUISITION
(REVISED 2/02)

1. What is the equipment purchased?

2. Was an RFP prepared? Documentation?

3. Was the award of the proposal given after the Environmental Release date?

Date of award:

4. Where is the equipment physically located?

5. Has the serial number of the equipment been recorded? Serial _:

Does the serial number agree with that on the purchase invoice?

6. Make grantee aware that all equipment purchased must be recorded in the Close Out Packet.

7. Make the grantee aware that any equipment acquired through the use of CDBG funds which contain a fair market value of more than \$5,000.00 the CDBG Office must be first be contacted before such an action takes place.

8. Comments:

CONNECTION FEES or SPECIAL ASSESSMENTS (REVISED 2/02)

PART I - PROJECT INFORMATION

1. Is the project: ☐ WATER ☐ SEWER

If not, what is the special assessment activity?

2. Does the construction of the entire project meet a National Objective? ☐ YES ☐ NO

3. Which National Objective? ☐ LMI ☐ S/B ☐ H/W

PART II - NATIONAL OBJECTIVE

1. Is the appropriate National Objective documentation in the file to demonstrate eligibility of the entire project? ☐ YES ☐ NO

- a. LMI - Community-wide survey instruments? ☐ YES ☐ NO
Survey tabulation sheet? ☐ YES ☐ NO

- b. S/B - resolution? ☐ YES ☐ NO

- c. H/W - documentation of lack of other funds availability? ☐ YES ☐ NO

- Evidence of non-existence of problem for 18 months prior to application? ☐ YES ☐ NO
Determination of immediate threat? ☐ YES ☐ NO

PART III - CAPITAL COSTS RECOVERY

1. Is the water/sewer system being paid partially/fully with CDBG funds? ☐ YES ☐ NO

If yes: Has grantee attempted to recover CDBG costs? If no, proceed to number 2 ☐ YES ☐ NO

Has grantee demonstrated that this special assessment has been made against LMI households? ☐ YES ☐ NO

Has grantee attempted to recover non-CDBG costs? I ☐ YES ☐ NO

How has grantee demonstrated that grantee has paid for special assessment against all LMI households?

2. Were CDBG funds used to pay for the construction of the new system? ☐ YES ☐ NO

- a. If yes, has grantee used CDBG funds to pay the special assessments for all LMI households? ☐ YES

- ☐
- NO

- b. If no, why not?

- c. If yes, has grantee demonstrated that special assessments being paid with CDBG funds will not be used to recover the costs of capital improvement? ☐ YES ☐ NO

- d. If no, and the grantee is paying special assessments for LMI households in an attempt to recover the costs of capital improvement, has grantee demonstrated:

- ☐ YES ☐ NO (i) the installation of the public improvement was carried out in compliance with requirements applicable to activities assisted under this sub part, including labor environmental and citizen participation requirements?

☐ YES ☐ NO (ii) The installation of the public improvement meets a criterion for national objectives?

☐ YES ☐ NO (iii) The special assessment made against LMI households was paid with CDBG funds?

PART IV - LMI APPLICANT ELIGIBILITY

When payment of special assessment fees for LMI households has been performed, grantee must have:

- ☐ a. Established an application process to identify and qualify all eligible LMI households.
- ☐ b. Qualified each applicant individually and prepared an individual file for each application containing all eligibility documentation.
- ☐ c. Documentation consists of evidence from the previous 12 months that applicant household met the LMI guidelines. Which documentation has grantee used?
 - ☐ IRS forms (line 23)
 - ☐ SSI forms (line 21a of IRS returns)
 - ☐ SSI check stubs
 - ☐ Medicaid check stubs
 - ☐ Retirement income information
 - ☐ Other:

c. Is the grantee using the appropriate LMI Income Guidelines to determine eligibility?

☐ YES

☐ NO

PART IV - FINANCIAL DOCUMENTATION

1. Grantee must have financial documents that demonstrate coordination of the assessments to assisted individuals, and payment of that assessment into the city's records on the applicants behalf with CDBG funds. ☐ YES ☐ NO

2. Comments: